

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Iowa

United States of America

v.

Terry Michael Doeden

Case No.

4:14-mj-00235

Defendant(s)

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CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IOWA

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of on or between 6/14/2014 and 7/18/2014 in the county of Marshall in the
Southern District of Iowa, the defendant(s) violated:

Code Section

18 U.S.C. Section 2422(b)

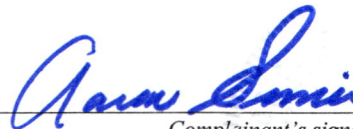
Offense Description

Enticement of a Minor

This criminal complaint is based on these facts:

See affidavit, attached and incorporated by reference

☒ Continued on the attached sheet.



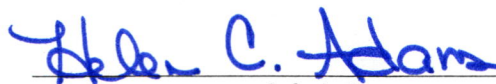
Complainant's signature

Aaron Simon, Special Agent, Homeland Security Investigations

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/17/2014



Judge's signature

City and state: Des Moines, Iowa

Helen C. Adams, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Aaron Simon, Special Agent with the Department of Homeland Security (DHS) Homeland Security Investigations (HSI), after being duly sworn to oath, do depose and state as follows:

1. **Affiant's Background.** I am a Special Agent (SA) with Homeland Security Investigations (HSI), within the United States Department of Homeland Security (DHS). Prior to my appointment with HSI, I was employed as a United States Postal Inspector for the previous 8 years. Before my appointment as a Postal Inspector, I was a Trooper for the State of Iowa for seven years. Before that, I was a Police Officer for the City of Kansas City, Missouri, for three years. In 2010, I attended a 6 month academy at the Federal Law Enforcement Center where I received training in investigations involving customs law and immigration Law. Two of the specific topics of training I received at the academy were child exploitation investigations and cybercrimes investigations. Additionally, on March 8th and 9th, 2011, I received training in digital evidence through the National District Attorney's Association. In November of 2011, I received 40 hours of specialized training on internet crimes against children investigative techniques. In February of 2012, I received additional advanced training in the investigation of child pornography and utilization of undercover law enforcement tools, including the Child Protection System (CPS) and SharazaLE. In September 2012, I attended a 16 hour additional training course in the area of Peer to Peer (P2P) networks, specifically the ARES network. I have received additional training during my Postal Inspector Academy in the use of the U.S. Mails for prohibited purposes, including the mailing and receipt of obscene and pornographic materials involving sexual exploitation of children, as defined in Title 18, United States Code, 1461 and 2252 through 2256. I was assigned from 2002 through 2005 to work child

exploitation/child pornography cases on a referral basis for 3 years and was assigned to the Internet Crimes Against Children Task Force in Sioux Falls, SD. I am currently a member of the Internet Crimes Against Children Task Force in Des Moines, IA. Through the various career changes, I have had over 3000 hours of classroom training and over 900 hours of hands on training. I have investigated, been trained in the investigation, or aided in the investigation of crimes involving murder, rape, robbery, customs violations, immigration violations, burglary, assaults, narcotic violations, child exploitation including violations of Title 18 U.S.C. Section 2422 (Coercion and enticement), mail fraud, mail theft, computer crimes, identity theft, and other various violations of city, state, and federal statutes. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. **Purpose of the Affidavit.** This affidavit is made in support of an arrest warrant for TERRY MICHAEL DOEDEN for violation of Title 18, United States Code, Section 2422(b), Enticement.

3. **Scope of the Affidavit.** The information contained within this affidavit is based on my personal observations or training and, where noted, information related to me by other law enforcement officers and/or agents. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that TERRY MICHAEL DOEDEN violated Title 18, United States Code, Section 2422(b), Enticement.

NATURE OF VIOLATION

4. **The Initial Investigation.** On July 18, 2014, Detective Sadie Weekley of the Marshalltown Police Department was dispatched to 211 W Ingledue in regards to a found juvenile. Earlier that same day, the Marshalltown Police Department had received a report on a missing juvenile female (identity known to this affiant) to be known in this affidavit as C.V. The parents of the juvenile victim told the police they might have information to where their daughter might be. They stated to the police that a friend of their daughter had told them that C.V. might be with an adult male named TERRY DOEDEN at 211 Ingledue Street, Marshalltown, Iowa.

5. On July 18, 2014, the Marshalltown Police Department went to 211 Ingledue Street, Marshalltown, Iowa to conduct a welfare check. Upon arrival, a female subject by the name of Maradean Egger answered the door. Ms. Egger was asked if anyone named terry lived with her at the address to which she replied yes. The police asked permission to step inside the residence to which they were granted permission. Once inside, a male subject walked up the stairs (the home was a split foyer home) and onto the landing by the door. The male subject was identified as Terry DOEDEN. DOEDEN was asked if he knew C.V. and he said yes. The police asked when was the last time he saw/spoke to her and he said last week via Facebook. DOEDEN was asked if C.V was at the residence to which he stated no. The police told DOEDEN they were looking for a missing juvenile and asked permission to search his bedroom and DOEDEN granted permission.

6. The police discovered C.V. lying naked in DOEDEN'S bed. The police asked DOEDEN why she was in his bed and he stated that C.V. had told him she didn't want to go home. The police field interviewed C.V. at the residence. C.V. at first stated she was naked in

the bed because she “gets hot easily”. C.V. denied having sex with DOEDEN and stated she had been with DOEDEN since the day before. C.V. stated to police she met him via Facebook.

7. Due to the possibility of a crime being committed, and an active crime scene, detectives were called to the residence to investigate. Detective Weekley arrived and asked C.V. if she would speak to her and get a sexual assault exam done. C.V. agreed to both. C.V. was interviewed at the Child Protection Center in Hiawatha by Kerstin Marnin on July 18, 2014. During that interview, C.V. admitted she and DOEDEN had sexual intercourse. C.V. stated she told DOEDEN she would only have sex with him if he paid her and he agreed to pay her \$200.00. C.V. stated during intercourse, DOEDEN ejaculated inside her and he did not wear a condom. C.V. also stated he performed oral sex on her and she performed oral sex on him. C.V. stated she knew DOEDEN was 24 years of age and he was well aware she was only 14 years of age.

8. On July 18, 2014, DOEDEN was read his Miranda rights by Detective Weekley and he agreed to an interview. DOEDEN stated he met C.V. through Facebook. DOEDEN was asked how many times he had sex with C.V. and he stated just once. DOEDEN at first admitted to only having oral sex with C.V. DOEDEN stated he touched her vagina with his finger and he could tell “she was wet”. Detective Weekley asked DOEDEN if he offered to pay C.V. money for sex to which he stated he did. DOEDEN stated he offered her \$200.00 for sex. Detective Weekley told DOEDEN that C.V. was going to have a sexual assault kit done on her and she asked him if they would find his semen inside of her. DOEDEN said no.

9. On July 18, 2014, Detective Weekley applied for, and was granted, a search warrant for DOEDEN'S cell phone, clothing, a buccal swab, and a penile swab. The search warrant was executed on the same day for the above listed items.

10. On July 24, 2014, C.V. and her father went to the Marshalltown Police Department. Detective Weekley asked permission to access C.V.'s Facebook account. C.V. and her father agreed. Detective Weekley accessed the messages between C.V. and DOEDEN. The dates of the conversation covered June 14, 2014 through July 18, 2014. Copies of the conversations were pasted into a word document for court purposes. On the same day, C.V.'s father signed a medical release form in order to obtain C.V.'s medical records for her visit on July 18, 2014.

11. On July 29, 2014, those medical records for C.V. were received by St. Luke's and were added to case file.

12. On October 2, 2014, the DCI report was received from the search warrant results on the buccal swab and penile swab. The DCI report stated: The DNA profile obtained from the sperm fraction of the vaginal swab showed the presence of DNA from more than one individual. Assuming a two person mixture and C.V. is an expected source; the partial profile (11 out of 15 loci) of the second contributor was consistent with the known profile of TERRY DOEDEN. The probability of finding this profile in a population of unrelated individuals, chosen at random, would be less than 1 out of 39 million.

13. **Excerpts from online conversations.** Between June 14, 2014 and July 18, 2014, Excerpts of some of the messages from DOEDEN to C.V. are set forth below:

- 06/14/2014 DOEDEN "Hey wats up"
- 06/14/2014 C.V. "hi"

- 06/14/2014 DOEDEN "Wats up Hows ur day hun"
- 06/14/2014 C.V. "it was good, yours?"
- 06/14/2014 DOEDEN "Not to bad was at my lil nieces dance recital !!! U wanna swap numbers hun"
- 06/14/2014 C.V. "I don't thnk my boytoy would like that very much"
- 06/14/2014 DOEDEN "Is he jus a fuck buddy or bf hun"
- 06/14/2014 C.V. "both"
- 06/14/2014 C.V. "how old are ya?"
- 06/14/2014 DOEDEN "That's good but if you ever want a man to treat u like ur supposed to be n be there for ur every need n want to give me chance Im 24 hope its ok hun"
- 06/14/2014 C.V. "oh"
- 06/14/2014 DOEDEN "Is that ok hun"
- 06/14/2014 C.V. "im 14.. lol"
- 06/14/2014 DOEDEN "How old r u?"
- 06/14/2014 C.V. "14"
- 06/14/2014 DOEDEN "That's ood hun!! So I got a question hun"
- 06/14/2014 C.V. "okay"
- 06/14/2014 DOEDEN "Cud we be fuck buddies I can get u wat ever u want hun"
- 06/14/2014 C.V. "uhm. Tf im a virgin and im not a whore"
- 06/14/2014 DOEDEN "Well then ill jus be ur boytoy, n im not claling u a whore hun"
- 06/14/2014 C.V. "just no... I hve a bf, who I adore and love" "i mean unless you can gimmie money"
- 06/14/2014 DOEDEN "How much money u tiking hun Cuz I got a jib n nobody to spend my money on"
- 06/14/2014 C.V. "how much you have?"
- 06/14/2014 DOEDEN "Enough hun name an amount hun, n I hope u can handle me hun Im willing to give u money hun"
- 06/14/2014 C.V. "yes, if I fuck you, I want 200\$ also my boy has to bet there"
- 06/14/2014 DOEDEN "No deal sorry only u n me if u want the money babe"
- 06/14/2014 C.V. "okay fine. He wont be there also hit andrea up" "oh well when you wanna fuck"
- 06/14/2014 DOEDEN "Next weekend if u want"
- 06/14/2014 DOEDEN "Wats ur favorite position tho hun"
- 06/14/2014 C.V. "doggy"
- 06/14/2014 DOEDEN "Damn hun bet u have a nice butt to huh? Id have to pull out or r u on birth control"
- 06/14/2014 C.V. "im on birth control"
- 06/14/2014 DOEDEN "So I won't have to pull out hun"
- 06/14/2014 C.V. "noo"
- 06/15/2014 DOEDEN "Illgive it to u anal if u can handle me"
- 06/15/2014 DOEDEN "So do u like rough n hard"
- 06/15/2014 C.V. "noi"
- 06/15/2014 DOEDEN "Soft deep n gentai hun"

- 06/15/2014 C.V. "yeh"
- 06/15/2014 DOEDEN "U like riding on top"
- 06/15/2014 C.V. "eh kinda"
- 06/15/2014 DOEDEN "U like doggy style hun"
- 06/15/2014 C.V. "yup"
- 06/15/2014 DOEDEN "U guna let me pound u doggy style"
- 06/15/2014 C.V. "yeh"
- 06/15/2014 DOEDEN "Can I cum on ur ass or ur tits"
- 06/14/2014 C.V. "sure"
- 06/16/2014 DOEDEN "U wanna fuck right now for a few hrs ?!"
- 06/16/2014 C.V. "im goin to my grandmas"
- 06/16/2014 DOEDEN "Damn cuz hard as fuck right now hun"
- 06/16/2014 C.V. "ill have sex with you"
- 06/14/2014 DOEDEN "Promise hun"
- 06/14/2014 C.V. "yes"
- 06/22/2014 DOEDEN "Seriously u wanna fuck right"
- 06/22/2014 C.V. "Yed Yes"
- 06/22/2014 DOEDEN "I can't wait to fuck u hun"

The conversation goes on for days talking about having sex and arranging a time and place to meet until July 17, 2014. Not all the conversation was included; however, a sampling was provided for probably cause only.

14. **Arrest of Terry DOEDEN.** Simultaneous with the execution of the search warrant, Marshalltown Police arrested Terry DOEDEN for 1 count of violation of Iowa Code Section(s) 709.4, Sexual abuse 3rd degree.

15. **Sex Offender:** On September 24, 2014, a computer check through NCIC showed that TERRY MICHAEL DOEDEN, wm DOB XX/XX/1990, has an outstanding warrant out of Minnesota for Failure to register as a sex offender. The following is the warrant entry:

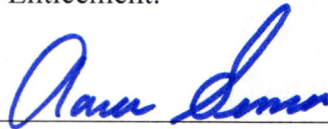
16. **Federal law.** Title 18, United States Code, Section 2422(b); Coercion and enticement, makes it a crime when, "whoever, using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States knowingly persuades, induces, entices, or coerces any individual who has not

attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be fined under this title and imprisoned not less than 10 years or for life.” DOEDEN used a facility of interstate commerce, namely the internet, knowingly used the facility of interstate commerce with the intent to persuade or entice a person to engage in illegal sexual activity; and believed that the person he sought to persuade or entice was under the age of eighteen. He intended to persuade or entice a minor to engage in illegal sexual activity.

17. Based upon the above facts, I believe there is probable cause to arrest Terry DOEDEN for violations of Title 18, United States Code, Section 2422(b), Coercion and enticement.

19. WHEREFORE, I respectfully request that a warrant be issued authorizing the Department of Homeland Security, Homeland Security Investigations, Special Agents and/or authorized law enforcement officers working with them to arrest Terry DOEDEN for violation of Title 18, United States Code, Section 2422(b), Enticement.

Dated: October 17, 2014



Aaron Simon
Special Agent, HSI/ICE

Subscribed to and sworn before me this 17th day of October, 2014.



Helen C. Adams
U.S. Magistrate Judge